

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Judge Ludwig

Motion for Order to Compel in Discovery Disputes
Format for Joint Submission

A joint statement of the dispute should be submitted either as part of or accompanying the motion to compel. The format of the statement should be as follows:

1. As to each discovery item in dispute: The interrogatory or document request, the applicable answer or response, or objection, and the respective positions of the parties should be set forth in that sequence and, if possible, on a single page. Case citations and other authority should be included. (This joint briefing obviates the need for separate briefs.)

2. Unless items in dispute can be consolidated because they involve the same issue and contentions, each item in dispute should begin with a new page.

3. The joint statement should be drafted initially by the movant and circulated to the nonmovant(s) for completion.

4. The statement should be signed by all counsel involved in the dispute.

If there is any question, please be in touch with the assigned law clerk.

Judge Edmund V. Ludwig

(Discovery - 12-88; 3-89; 10-97; 10-99)